



# CALIFORNIA BUILDING CODE (2006 IBC) PUBLIC PROPOSAL FORM

PLEASE SEE REVERSE FOR INSTRUCTIONS ON SUBMITTING PUBLIC PROPOSALS. PROPOSALS MUST COMPLY WITH THESE INSTRUCTIONS.

- 1) Indicate the format in which you would like to receive your Public Proposals Monograph (PPM), Report of the Hearing (ROH) and Final Action Agenda (FAA):

☒ Paper ☐ \* CD ☐ \*Download from ICC Website

(\*Note: A paper copy will not be sent to you if you have chosen the CD or Download format.)

- 2) PLEASE TYPE OR PRINT CLEARLY: FORMS WILL BE RETURNED if they contain unreadable information.

Name:	Rick Thornberry, P.E.				Date:	12-23-05
Jurisdiction/Company:	The Code Consortium, Inc.					
Submitted on Behalf of:	Alliance for Fire and Smoke Containment and Control (AFSCC)					
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- 3) \*Signature: ☒ Signature on File (see over)

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- 4) Cost Impact: Indicate if this Proposal: ☐ will ☐ will not increase the cost of construction.

- 5) Indicate appropriate International Code(s) associated with this Public Proposal – Please use Acronym:

IBC

If you have also submitted a separate coordination change to another I-Code, please indicate the code: \_\_\_\_\_  
(See back of this form for list of names and acronyms for the International Codes).

- 6) Revision to: ☒ Section 506.3 ☐ Table ☐ Figure

- 7) PROPOSAL Please check appropriate box:

☒ Revise as follows: ☐ Add new text as follows ☐ Delete and substitute as follows: ☐ Delete without Substitution(s):

Show the proposed NEW, REVISED or DELETED TEXT in legislative format: ~~Line through text to be deleted.~~ Underline text to be added.

**506.3 Automatic sprinkler system increase.** Where a building is protected throughout with an approved automatic sprinkler system in accordance with Section 903.3.1.1, the area limitation in Table 503 is permitted to be increased by an additional 200 percent ( $I_s = 200$  percent) for buildings with more than one story above grade plane and an additional 300 percent ( $I_s = 300$  percent) for buildings with more than one story above grade plane. These increases ~~are~~ shall not be permitted where in addition to the height and story height increases in accordance with Section 504.2 are used.

#### Exceptions:

- Buildings with an occupancy in Group H-1 or H-2 ~~or~~ H-3.
- Fire-resistance rating substitution in accordance with Table 601, Note d.

☐ PROPOSAL Continued (Attach additional sheets as necessary)

- 8) SUPPORTING INFORMATION (State purpose and reason, and provide substantiation to support proposed change):

The purpose of this proposed amendment is to eliminate the “double dipping” that is presently allowed in the IBC where automatic sprinkler systems are provided in buildings. This “double dipping” is a result of allowing both area increases and height increases for the allowable heights and areas for buildings contained in Table 503. Implementing this amendment would be consistent with Section 505.3 Automatic Sprinkler Systems and Section 506 Maximum Height of Buildings and Increases of the 1997 Uniform Building Code (UBC) currently adopted by California. The UBC will only allow the use of an automatic sprinkler system to increase the allowable area of a building or to increase the maximum height of a building in number of stories, but not both. That is because such a practice results in excessive building volume for the minimum type of construction required which, in effect, increases the total fire load of a building, as well as its occupant load, while relying

on the automatic sprinkler system to compensate for the significant increase in building size.

We believe that the UBC approach makes sense and does not overly rely on the use of automatic sprinkler systems in lieu of providing minimum built-in fire resistant protection for buildings. Please refer to the white paper entitled "The Need for Balanced Fire Protection in Buildings" which documents the Alliance for Fire and Smoke Containment and Control's (AFSCC) position on sprinkler trade-offs.

It should be noted that the allowable heights and areas presently contained in Table 503 of the IBC are already in most cases significantly greater than those presently allowed by Table 5-B of the UBC as adopted by California. Allowing automatic sprinkler system increases for both height and area only compounds that problem, resulting in a lessened use of fire resistant and noncombustible construction. Both sprinklers and fire resistant construction play an important role in the overall level of fire and life safety provided in buildings. Therefore, there should not be an excessive reliance on one or the other at the expense of the other which will result in a lessening of the overall level of fire and life safety provided by the code.

We believe it is important for California to maintain the excellent level of fire and life safety its building and fire codes have provided for its citizens. In adopting a new building code, it behooves those responsible for implementing the adoption of that code to understand the impact such a new code may have on the level of fire and life safety that will be provided in new buildings constructed under that code as compared to the level provided by the previous code. Unless there is adequate technical documentation to justify reductions in the level of fire and life safety, a new code should not be adopted without an appropriate assessment of the impact it will have on the level of fire and life safety provided in the built environment. It is the opinion of the AFFSC that this proposed code change is very important in assuring that the new California Building Code will not overly rely upon automatic sprinklers at the expense of less built-in fire resistant and noncombustible construction in new buildings.



SUPPORTING INFORMATION *Continued* (Attach additional sheets as necessary)